

Carmine LoFaro\*  
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Please reply to Hackensack

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June 29, 2017

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**VIA ECF**

Honorable Rosemary H. Gambardella, U.S.B.J.  
United States Bankruptcy Court  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, New Jersey 07601

**Re: Wolff vs. Tzanides**  
**Adv. Pro. No.: 16-1261**  
**Defendants' Motion to Dismiss Complaint and/or for Summary Judgment**  
**Filing Date: April 22, 2016**  
**Original Hearing Date: May 17, 2016**  
**Adjourned Hearing Date: October 11, 2016**

Dear Judge Gambardella:

My firm represents the defendant Helen Tzanides in the above-referenced adversary proceeding. At my client's request I am writing to inquire when the Court anticipates issuing a ruling on the motion to dismiss the Trustee's Complaint which asserts fraudulent transfer and constructive trust claims concerning residential real estate. The motion was filed on April 22, 2016 and was argued on October 11, 2016.

The Trustee has clouded title to my client's property by filing a Lis Pendens. As Your Honor can appreciate, my client is anxious to receive the Court's decision on the motion. A resolution of the motion in the near future would be greatly appreciated, and more importantly would be in the best interests of all parties.

Thank you for Your Honor's assistance in this matter.

Respectfully,

/s/ Glenn R. Reiser

Cc: Andrea Dobin, Esq. (via ECF & E-Mail)  
Jay Lubetkin, Esq. (via ECF & E-Mail)  
Helen Tzanides (via E-Mail)